



Order Filed on May 29, 2025
by Clerk
U.S. Bankruptcy Court
District of New Jersey

MELLINGER KARTZMAN LLC
101 Gibraltar Drive, Suite 2F
Morris Plains, New Jersey 07950
Steven A. Jayson, Esq.
Tel. (973) 267-0220
sjayson@msklaw.net
Attorneys for Andrea Klein

In re:

ERIC PAUL KLEIN,

Debtor.

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

Case No. 23-19344

Chapter 7

**CONSENT ORDER BETWEEN THE TRUSTEE AND ANDREA KLEIN GRANTING
RELIEF FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362 TO
PROCEED WITH AN ACTION IN THE CHANCERY DIVISION: FAMILY PART**

The relief set forth on the following pages numbered two (2) through three (3) is hereby
ORDERED.

DATED: May 29, 2025



Honorable Mark E. Hall
United States Bankruptcy Judge

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Debtor: Eric Paul Klein

Case No.: 23-19344

Caption: Consent Order Between the Trustee and Andrea Klein Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362 to Proceed with an Action in the Chancery Division: Family Part

THIS MATTER having been brought before the Court by Andrea Klein (“Klein”), by and through her attorneys Mellinger Kartzman LLC, on application in lieu of motion pursuant to FED. R. BANKR. P. 9019 and D.N.J. LBR 9019-4(b) for a Consent Order Between Jeffrey Testa (the “Trustee”) and Andrea Klein Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362 to Proceed with an Action in the Chancery Division: Family Part (the “Consent Order”); and Klein and the Trustee having amicably resolved the issues on the terms set forth herein, as appears from the signatures of counsel affixed hereto, it is hereby

ORDERED AS FOLLOWS:

1. Klein is granted immediate relief from the automatic stay arising from this bankruptcy case to allow the divorce action between Klein and the Debtor to proceed with respect to all matters, which matters may include:

- a. The granting of a divorce to the parties;
- b. Child custody and parenting time;
- c. Equitable distribution;
- d. The adjudication of all claims to alimony, maintenance, and support; and
- e. All such other relief in law or equity as the court may deem just and proper in order to grant complete relief to the Debtor and/or Klein and their minor children, except as set forth in Paragraph 2 herein.

2. Relief from the automatic stay is not granted by this Order to permit the enforcement, collection, or satisfaction (including, without limitation, levy or garnishment) of any of the Debtor’s obligations from any assets of the Debtor’s Chapter 7 bankruptcy estate.

3. The requirements imposed by FED. R. BANKR. P. 4001(a)(3) and D.N.J. LBR 4001-1 and 4001-4 are and shall be waived. Thus, relief from the automatic stay is effective immediately upon entry of the Order.

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Debtor: Eric Paul Klein

Case No.: 23-19344

Caption: Consent Order Between the Trustee and Andrea Klein Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362 to Proceed with an Action in the Chancery Division: Family Part

4. A copy of this Order shall be served on all interested parties within five (5) days

from the date of entry.

The undersigned hereby consent to the form and entry of the within Order:

MELLINGER KARTZMAN LLC
Attorneys for Andrea Klein (Bankruptcy Counsel)

By: 
STEVEN A. JAYSON, ESQ.

Dated: ~~March~~ May 9, 2025
May 9, 2025

GENOVA BURNS LLC
Attorneys for Jeffrey Testa, Chapter 7 Trustee

By: 
SCOTT S. REVER, ESQ.

Dated: ~~March~~ May 9, 2025
May 9, 2025

Minram and Sherman



Scott D. Sherman
5/28/2025